

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Olympia Y Howell	:	Chapter 13
	:	Case No.: 20-11702-AMC
Debtor(s)	:	

OBJECTION TO CERTIFICATION OF DEFAULT

Debtor, Olympia Y Howell, by and through their undersigned counsel Brad J. Sadek, hereby objects Rushmore Servicing's, Certification of Default on the following basis:

It is Denied that Debtor/Borrower, Olympia Y Howell, is delinquent on the April 01, 2022, stipulation. By way of further answer, Debtor/Borrower made a recent payment to satisfy the lender's Notice of Default. If the Debtor/Borrower is delinquent, she shall be current prior to the hearing on the lender's instant Certification of Default.

WHEREFORE, Debtors respectfully requests this Honorable Court to DENY Movant's Order requesting Relief from the Automatic Stay.

Dated: August 27, 2024

/s/ Brad J. Sadek, Esq.

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